REMARKS
Reconsideration And Allowance
Are Respectfully Requested.

Claims 1-12 are currently pending. Claim 1 has been amended . Claim 13 has been added, dependent upon Claim 1. No new matter has been added. Reconsideration is respectfully requested.

Support for the amendments to Claim 1, which specifies that the reaction proceeds as an ionic reaction through displacement of the halogen atom, is found at Page 8 of the application, which shows the chemical reaction sequence clearly indicating an ionic and not a free radical mechanism (as is otherwise taught in Bowser). The additional wording added in the second paragraph of Claim 1 merely characterizes the nature of the polymeric base material in that they are selected from the group consisting of a terpolymer and a copolymer or polymer. The Markush grouping for the polymeric base material, however, has not been expanded and has been narrowed to the indicated polymeric base materials. New Claim 13 has been added to indicate that the polymeric base material, the cross-linking agent and the adhesion promoter are added together in a single vessel. Support for this addition is seen in the Example set forth at Pages 12-14.

The unique properties of the composition defined in the claims is due to the nature of the reaction sequence as indicated more specifically in the Certification of Melvin Auerbach attached hereto. Specifically, the reaction goes by way of an ionic displacement at the halogen atom. The mechanism is shown at Page 8 of the application and involves in this case the bromine atom, although other halogen atoms can be utilized. In this sequence, the bromine atom is appended to the methyl side chain of the benzene ring. The cross-linking agent functions as a displacement agent in this ionic reaction displacing the bromine from the methyl group and resulting in a cross-link polymer (copolymer). The resulting product displays a toughness that is totally different from that

taught in Bowser, wherein a metal spacer is required to maintain the integrity of the product (see, for example, Column 11, Lines 30-33). The reason a spacer is not required in applicant's composition is because the cross-link product is so different from that taught in Bowser, due in large part to the ionic displacement reaction which results in a different product than the free radical initiated reaction of Bowser.

In addition, Bowser teaches the uses of two separate mixing vessels (see Column 9, Lines 50-70, and Column 10, Lines 1-25). This is contrasted with applicant's invention in which the composition, in one embodiment, is formulated in one vessel. The two processes are clearly seen to be substantially distinct, ultimately resulting in an inferior product being produced by Bowser. Thus, the combination of an ionic displacement reaction with the mixing sequence in one vessel as indicated in Claim 13, leads to a product that is distinguishable from the Bowser composition.

The other arguments contained in the Certification of Melvin Auerbach are incorporated herein by reference.

In Kaeding, a vapor barrier or "stop" is taught as a necessary element of its composition. As now amended, applicant's claims specifically disclose an ionic reaction as a process for forming its composition which is totally distinct from that taught by Kaeding. The proof of that statement is the fact that Kaeding required the "stop" or vapor barrier which is not required by applicant. Kaeding's composition has minimal cross-linking, thereby requiring the vapor barrier or "stop". It is believed that the limitations engrafted in the claims as they now stand, overcome the Kaeding teachings.

CONCLUSIONS

In view of the above, it is respectfully requested that the claims as now amended are in condition for allowance. Neither Bowser nor Kaeding disclose the unique compositions of applicant's invention which are obtained in the context of an ionic displacement reaction. Allowance of the claims is hereby respectfully requested.

Respectfully submitted,

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